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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

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IN RE JUNIPER NETWORKS, INC.  
SECURITIES LITIGATION

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This Document Relates to:  
All Actions

No. C 06-04327-JW

STIPULATION AND [PROPOSED] ORDER  
ENLARGING LEAD PLAINTIFF'S TIME TO  
AMEND THE BERRY COMPLAINT AND  
SCHEDULING CASE MANAGEMENT  
CONFERENCE FOUND AS MOOT.

BEFORE: Hon. James Ware

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THE NEW YORK CITY EMPLOYEES'  
RETIREMENT SYSTEMS, *et al.*,

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Plaintiffs,  
v.  
LISA C. BERRY,  
Defendant.

No. C08-0246-JW

BEFORE: Hon. James Ware

1        This Stipulation is entered into by and among Lead Plaintiff the New York City Pension  
2 Funds, defendant Lisa C. Berry, defendants Juniper Networks, Inc., Scott Kriens, Pradeep  
3 Sindhu, Marcel Gani, Robert M. Calderoni, Kenneth Goldman, William R. Hearst III, Stratton  
4 Sclavos, Vinod Khosla, Kenneth Levy, and William R. Stensrud (the “Juniper Defendants”) and  
5 defendant Ernst & Young, by and through their respective attorneys of record.

6        WHEREAS, on January 14, 2008, Lead Plaintiff the New York City Pension Funds filed  
7 an action captioned *The New York City Employees, Retirement Systems, et al., v. Lisa C. Berry*,  
8 No. C08-0246-JW (the “Berry Action”), as a related case to the pending class actions under the  
9 caption *In re Juniper Networks, Inc. Securities Litigation*, Lead Case No. C-06-04327-JW (the  
10 “Juniper Action”);

11        WHEREAS, by Order dated October 1, 2008, the Court denied the Juniper Defendants’  
12 Motion to consolidate the Berry Action with the Juniper Action with leave to renew pending  
13 resolution of the Motion to Dismiss in the Berry Action;

14        WHEREAS, by Order dated May 15, 2009, the Court (1) denied Ms. Berry’s motion to  
15 dismiss Lead Plaintiff’s claims under sections 10(b) and 20(a) of the Exchange Act and SEC  
16 Rule 10b-5; (2) gave Lead Plaintiff the option of filing, on or before June 5, 2009, an amended  
17 complaint in the Berry Action that would “specify in greater detail the nature and extent of  
18 Defendant’s purported substantial participation” with respect to certain alleged misstatements in  
19 the Berry Complaint; and (3) directed Lead Plaintiff and Berry to file a Joint Case Management  
20 Statement on or before June 5, 2009, and appear for a Case Management Conference on June 15,  
21 2009;

22        WHEREAS, counsel for Lead Plaintiff has conferred with counsel for Defendants  
23 regarding, *inter alia*, filing an omnibus Joint Case Management Statement, and all counsel agree  
24 and request that the status conference scheduled for June 15, 2009 apply in both the Berry Action  
25 and the Juniper Action;

26        WHEREAS, Lead Plaintiff and defendant Berry agree that Lead Plaintiff’s time to amend  
27 the Complaint in the Berry Action should be extended from June 5, 2009 to July 9, 2009; and

28 STIPULATION AND [PROPOSED] ORDER ENLARGING LEAD PLAINTIFF’S TIME TO AMEND THE BERRY/00095844.DOC v12  
COMPLAINT AND SCHEDULING CASE MANAGEMENT CONFERENCE  
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1 WHEREFORE, the parties stipulate, and request the Court to order, as follows:

2 1. Lead Plaintiff's time to amend the Complaint in the Berry Action is extended

3 from June 5, 2009 to July 9, 2009.

4 2. The parties in the Berry and Juniper Actions shall file Joint Case Management

5 Statements on or before June 5, 2009, that address, *inter alia*, the parties' positions with respect

6 to consolidation of the Actions, class certification and discovery, and appear at the June 15, 2009

7 Case Management Conference scheduled before Judge Ware.

8

9 Respectfully Submitted,

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11 Dated: May 29, 2009

LOWEY DANNENBERG COHEN & HART, P.C.

12 By: /s/ David C. Harrison

13 David C. Harrison

14 *Attorneys for Lead Plaintiffs*

16 I, David C. Harrison, am the ECF user whose ID and password are being used to file this  
17 Stipulation and [Proposed] Order Consolidating Cases and Extending Lead Plaintiff's Time to  
18 Amend the Berry Complaint. In compliance with General Order 45, X.B., I hereby attest that  
19 Steven Guggenheim has concurred in this filing, and I have his manual signature on file.

20 Dated: May 29, 2009

WILSON SONSINI GOODRICH & ROSATI

21 By: /s/

22 650 Page Mill Road  
23 Palo Alto, CA 94304-1050  
24 Telephone: (650) 493-9300  
25 Facsimile: (650) 565-5100

26 *Counsel for the Juniper Defendants*

27 I, David C. Harrison, am the ECF user whose ID and password are being used to file this  
28 Stipulation and [Proposed] Order Consolidating Cases and Extending Lead Plaintiff's Time to  
Amend the Berry Complaint. In compliance with General Order 45, X.B., I hereby attest that  
David Friedman has concurred in this filing, and I have his manual signature on file.

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2  
3 Dated: May 29, 2009

LATHAM & WATKINS

4  
5 By:

6 \_\_\_\_\_ /s/  
7 505 Montgomery Street, Suite 2000  
8 San Francisco, CA 94111-6538  
9 Telephone: 415-391-0600  
10 Facsimile: 415-395-8095

11 *Counsel for Defendant Ernst & Young*

12 I, David C. Harrison, am the ECF user whose ID and password are being used to file this  
13 Stipulation and [Proposed] Order Consolidating Cases and Extending Lead Plaintiff's Time to  
14 Amend the Berry Complaint. In compliance with General Order 45, X.B., I hereby attest that  
15 Nancy Harris has concurred in this filing, and I have her manual signature on file.

16 Dated: May 29, 2009

17 ORRICK HERRINGTON & SUTCLIFFE LLP

18 By:

19 \_\_\_\_\_ /s/  
20 The Orrick Building  
21 405 Howard Street  
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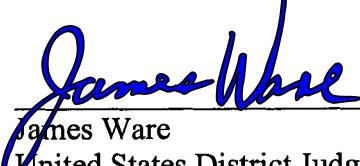
25 *Counsel for Defendant Lisa C. Berry*

26 \* \* \*

27 **O R D E R**

28 The stipulation is found as MOOT. Plaintiff has filed an Amended Complaint in the Berry  
29 Action on June 5, 2009. The Court declines to set a case management conference on June  
30 15, 2009 in the Juniper Action as this time.

31 DATED: June 11, 2009

32   
33 James Ware  
34 United States District Judge